

ATTACHMENT D

Fact Sheet

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
1515 CLAY STREET, SUITE 1400
OAKLAND, CA 94612
(510) 622 - 2300 Fax: (510) 622 - 2460

FACT SHEET
for

NPDES PERMIT and WASTE DISCHARGE REQUIREMENTS for
BOTTLING GROUP, LLC
HAYWARD, ALAMEDA COUNTY
NPDES Permit No. CA0030058
ORDER NO. R2-2003-XXXX

PUBLIC NOTICE:

Written Comments

- Interested persons are invited to submit written comments concerning this draft permit.
- Comments must be submitted to the Regional Board no later than 5:00 p.m. on **May 19, 2003**.
- Send comments to the Attention of Daniel Leva.

Public Hearing

- The draft permit will be considered for adoption by the Board at a public hearing during the Board's regular monthly meeting at: Elihu Harris State Office Building, 1515 Clay Street, Oakland, CA; 1st floor Auditorium.
- This meeting will be held on: **June 18, 2003**, starting at 9:00 am.

Additional Information

- For additional information about this matter, interested persons should contact Regional Board staff member: Mr. Daniel Leva, Phone: (510) 622-2415; email: dkl@rb2.swrcb.ca.gov

This Fact Sheet contains information regarding an application for waste discharge requirements and National Pollutant Discharge Elimination System (NPDES) permit for Bottling Group, LLC (Discharger) for treated wastewater discharges. The Fact Sheet describes the factual, legal, and methodological basis for the proposed permit and provides supporting documentation to explain the rationale and assumptions used in deriving the limits.

I. INTRODUCTION

The Discharger applied to the Board for reissuance of waste discharge requirements and a permit to discharge municipal wastewater to waters of the State and the United States under the NPDES. The application and Report of Waste Discharge is dated July 12, 2001.

The Discharger operates a bottled water and soft drink manufacturing, bottling, and distribution facility. As part of the manufacturing process, the facility requires ultra clean water for its products. To obtain the highest quality of water, two reverse osmosis (R/O) units are utilized to treat influent raw water. Currently, the Discharger discharges on average 110,000 gallons per day (mgd) of treated reverse osmosis concentrate. The U.S. EPA and the Board have classified this Discharger as a minor discharger.

This NPDES permit protects all beneficial uses of the receiving water (ACFCWCD Flood Channel) and of downstream waterbodies, such as the Old Alameda Creek. Protection of the beneficial uses of specifically named waterbodies and its tributaries is based on Chapter 2 of the Basin Plan. The beneficial uses designated in the Basin Plan for Alameda Creek and its tributaries include:

- a. Agricultural Supply
- b. Cold Freshwater Habitat
- c. Groundwater Recharge
- d. Fish Migration
- e. Water Contact Recreation
- f. Non-Contact Water Recreation
- g. Fish Spawning
- h. Warm Freshwater Habitat
- i. Wildlife Habitat

Based on two salinity measurements taken 50 feet downstream of the discharge point (0.12 ppt and 2.2 ppt), the receiving water is freshwater by the Basin Plan definition, and estuarine by the CTR definition. Therefore, the effluent limitations specified in this Order for discharges to ACFCWCD Flood Channel are based on freshwater Basin Plan WQOs and the lower of freshwater and saltwater CTR and NTR WQC.

II. DESCRIPTION OF EFFLUENT

The table below presents the quality of the discharge, as indicated in the Discharger's self-monitoring reports submitted for the period from January 2000 through September 2002. Average values represent the average of actual detected values only.

Table A. Summary of Discharge Data

Parameter	Average	Daily Maximum
pH, standard units	--	6.4 – 8.5 ¹
Temperature, degrees C	15.7	20.4
TSS, mg/L	1.5	2
TDS, mg/L	354	5430
Residual chlorine, mg/L	0.09	0.168
Antimony, µg/L	0.91	2.9
Arsenic, µg/L	1.07	1.6
Cadmium, µg/L	0.04	0.05
Chromium (III), µg/L	2.32	6.4
Copper, µg/L	5.1	12
Lead, µg/L	0.99	1.3
Mercury, µg/L	0.002 ²	0.002 ²
Nickel, µg/L	2.53	3.7
Silver, µg/L	0.15	0.15 ³
Thallium, µg/L	0.01	0.01 ³
Zinc, µg/L	20	26
Chloroform, µg/L	93	110
Dichlorobromomethane, µg/L	4.75	7.2
Methyl bromide, µg/L	8.4	8.4 ⁴

¹ This represents the range of pH values. There was one exceedance of the effluent limitation.

² Based on the single available ultra-clean mercury measurement.

³ All detected values were the same value.

⁴ There was only one detected value for methyl bromide.

The table below presents the quality of the discharge, as indicated in the Discharger's permit renewal application, dated July 12, 2001.

<u>Parameter</u>	<u>Daily Maximum</u>
pH, standard units	7.55
BOD ₅ , mg/L	< 1.0
COD, mg/L	21
TOC, mg/L	12
TSS, mg/L	230
Ammonia, as N, mg/L	0.27
Temperature, degrees C	15/18. ¹

¹ Represents winter and summer temperatures, respectively.

III. GENERAL RATIONALE

The following documents are the bases for the requirements contained in the proposed Order, and are referred to under the specific rationale section of this Fact Sheet.

- Federal Water Pollution Control Act, as amended (hereinafter the **CWA**).
- Federal Code of Regulations, Title 40 - Protection of Environment, Chapter 1, Environmental Protection Agency, Subchapter D, Water Programs, Parts 122-129 (hereinafter referred to as 40 CFR specific part number).
- Water Quality Control Plan, San Francisco Bay Basin, adopted by the Board on June 21, 1995 (hereinafter the **Basin Plan**). The California State Water Resources Control Board (hereinafter the **State Board**) approved the Basin Plan on July 20, 1995 and by California State Office of Administrative Law approved it on November 13, 1995. The Basin Plan defines beneficial uses and contains WQOs for waters of the State, including Alameda Creek and the lower San Francisco Bay.
- California Toxics Rules, Federal Register, Vol. 65, No. 97, May 18, 2000 (hereinafter the **CTR**).
- National Toxics Rules 57 FR 60848, December 22, 1992, as amended (hereinafter the **NTR**).
- State Board's Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California, May 1, 2000 (hereinafter the **State Implementation Policy**, or **SIP**).
- Ambient Water Quality Criteria for Bacteria – 1986, U.S. EPA 440/5-84-002, January 1986.
- U.S. EPA Technical Support Document for Water Quality-Based Toxics Control, EPA/505/2-90-001, March 1991 (hereinafter TSD).

IV. SPECIFIC RATIONALE

Several specific factors affecting the development of limitations and requirements in the proposed Order are discussed as follows:

1. Recent Plant Performance

Section 402(o) of CWA and 40 CFR § 122.44(l) require that water quality-based effluent limits (**WQBELs**) in re-issued permits be at least as stringent as in the previous permit. The SIP specifies that interim effluent limitations, if required, must be based on current treatment facility performance or on existing permit limitations whichever is more stringent. In determining what constitutes “recent plant performance”, best professional judgment (**BPJ**) was used. Effluent monitoring data collected from 2000 to 2002 are considered representative of recent plant performance.

2. Impaired Water Bodies in 303(d) List

The U.S. EPA Region 9 office approved the State’s 303(d) list of impaired waterbodies on May 12, 1999. The list was prepared in accordance with section 303(d) of the CWA to identify specific water bodies where water quality standards are not expected to be met after implementation of technology-based effluent limitations on point sources. Alameda Creek and the lower San Francisco Bay are both listed as impaired waterbodies. The pollutants impairing lower San Francisco Bay include copper, mercury, nickel, PCBs total, dioxin TEQ and furan compounds, chlordane, DDT, dieldrin, diazinon, dioxin TEQ-like PCBs, and exotic species. Alameda Creek is impaired by diazinon.

The SIP requires final effluent limits for all 303(d)-listed pollutants to be based on total maximum daily loads (**TMDLs**) and wasteload allocation (**WLA**) results. The SIP and federal regulations also require that final concentration limits be included for all pollutants with reasonable potential. The SIP requires that where the Discharger has demonstrated infeasibility to meet the final limits, interim concentration limits, and performance-based mass limits for bioaccumulative pollutants, be established in the permit with a compliance schedule in effect until final effluent limits are adopted. The SIP also requires the inclusion of appropriate provisions for waste minimization and source control.

3. Basis for Prohibitions

- a). Prohibition A.1 (no discharges other than as described in the permit): This prohibition is based on the Basin Plan, previous Order, and BPJ.

4. Basis for Effluent Limitations

- a) Effluent Limitations B.1 (Residual Chlorine): There are no technology-based effluent limitation guidelines for reverse osmosis facilities. The residual chlorine limits is based on the existing permit and the Basin Plan (Chapter 4, p. 4-8, and Table 4-2, at p. 4-69).
- b) Effluent Limitation B.2 (pH): This effluent limit is unchanged from the existing permit. The limit is based on the Basin Plan (Chapter 4, Table 4-2), which is derived from federal requirements (40 CFR 133.102). This is an existing permit effluent limitation and compliance has been demonstrated by existing plant performance.
- c) Effluent Limitation B.3 (Discharge Flow): This effluent flow limit is based on the reliable treatment capacity of the plant. Exceedence of the plant's flow design capacity may result in lowering the reliability of compliance with water quality requirements, unless the Discharger

demonstrates otherwise through an antidegradation study. This prohibition is based on 40 CFR 122.41(l).

- d) Effluent Limitation B.4 (Whole Effluent Acute Toxicity): The Basin Plan specifies a narrative objective for toxicity, requiring that all waters shall be maintained free of toxic substances in concentrations that are lethal to or produce other detrimental response on aquatic organisms. Detrimental response includes but is not limited to decreased growth rate, decreased reproductive success of resident or indicator species, and/or significant alternations in population, community ecology, or receiving water biota. These effluent toxicity limits are necessary to ensure that this objective is protected. The whole effluent acute toxicity limits for a three-sample median and single sample maximum are consistent with the previous Order and are based on the Basin Plan (Table 4-4, pg. 4-70).
- e) Effluent Limitation By Point of Reference – Findings 43 and 46 (Toxic Substances):
 - 1. Reasonable Potential Analysis (RPA):

40 CFR 122.44(d)(1)(i) specifies that permits are required to include WQBELs for all pollutants “which the Director determines are or may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard”. Thus, the fundamental step in determining whether or not a WQBEL is required is to assess a pollutant’s reasonable potential of excursion of its applicable WQO or WQC. The following section describes the RPA methodology and the results of such an analysis for the pollutants identified in the Basin Plan and the CTR.

 - i) *WQOs and WQC:* The RPA involves the comparison of effluent data with appropriate WQOs including narrative toxicity objectives in the Basin Plan, applicable WQC in the CTR/NTR, and U.S. EPA’s 1986 Quality Criteria for Water. The Basin Plan objectives and CTR criteria are shown in Attachment 3 of this Fact Sheet.
 - ii) *Methodology:* The RPA is conducted using the method and procedures prescribed in Section 1.3 of the SIP. Board staff has analyzed the effluent and background data and the nature of facility operations to determine if the discharge has reasonable potential to cause or contribute to exceedances of applicable WQOs or WQC. Attachment 3 of this Fact Sheet shows the step-wise process described in Section 1.3 of the SIP.
 - iii) *Effluent and background data:* The RPA was based on effluent monitoring data submitted with the permit renewal application, sampled during 1996 and 2001. Four data points for most metals were available from 1996 sampling. 2001 effluent data include one data point for chromium (III and VI), mercury, cyanide, and dioxin; and 2002 effluent data include four additional measurements for copper. Two data points for most other priority pollutants in the CTR were available, one sample each from 1996 and 2001 (see Attachment 2 of this Fact Sheet). There are insufficient ambient background data available for Alameda Creek, to determine whether there is reasonable potential due to the second SIP trigger (B>WQO/WQC). By letter dated August 6, 2001 by Board staff, entitled Requirement for Monitoring of Pollutants in Effluent and Receiving Water to Implement New Statewide Regulations and Policy, the Board’s Executive Officer required the Discharger conduct additional monitoring pursuant to section 13267 of the California Water Code. The Board staff will reevaluate RP, as appropriate, when these data become available.

iv) *RPA determination:* The RPA results are shown below in Table B and Attachment 3 of this Fact Sheet. The pollutants that exhibit RP are copper and lead.

Table B. Summary of Reasonable Potential Results

# in CTR	PRIORITY POLLUTANTS	MEC or Minimum DL ¹ ($\mu\text{g/L}$)	Governing WQO/WQC ($\mu\text{g/L}$)	Maximum Background ($\mu\text{g/L}$)	RPA Results ²
2	Arsenic	1.6	190	NA	N
4	Cadmium	0.05	0.382	NA	N
5b	Chromium (VI)	10	11	NA	N
6	Copper	12	3.62	NA	Y
7	Lead	1.3	0.545	NA	Y
8	Mercury	0.002	0.025	NA	N
9	Nickel	3.7	48.8	NA	N
10	Selenium	0.6	5	NA	N
11	Silver	0.15	0.37	NA	Ud
13	Zinc	26	32.75	NA	Ud
14	Cyanide	10	5.2	NA	N
16	2,3,7,8-TCDD (Dioxin)	0.00043	1.4E-08	NA	N
17	Acrolein	10	780	NA	N
18	Acrylonitrile	2	0.66	NA	N
19	Benzene	1	71	NA	N
20	Bromoform	1	360	NA	N
21	Carbon Tetrachloride	1	4.4	NA	N
22	Chlorobenzene	2	21000	NA	N
23	Chlorodibromomethane	1	34	NA	N
24	Chloroethane	1	NA	NA	Uo
25	2-Chloroethylvinyl Ether	2	NA	NA	Uo
26	Chloroform	110	NA	NA	Uo
27	Dichlorobromomethane	7.2	46	NA	N
28	1,1-Dichloroethane	1	NA	NA	Uo
29	1,2-Dichloroethane	1	99	NA	N
30	1,1-Dichloroethylene	1	3.2	NA	N
31	1,2-Dichloropropane	1	39	NA	N
32	1,3-Dichloropropylene	2	1700	NA	N
33	Ethylbenzene	1	29000	NA	N
34	Methyl Bromide	8.4	4000	NA	N
35	Methyl Chloride	1	NA	NA	Uo
36	Methylene Chloride	5	1600	NA	N
37	1,1,2,2-Tetrachloroethane	1	11	NA	N
38	Tetrachloroethylene	1	8.85	NA	N
39	Toluene	1	200000	NA	N
40	1,2-Trans-Dichloroethylene	1	140000	NA	N
41	1,1,1-Trichloroethane	1	NA	NA	Uo
42	1,1,2-Trichloroethane	1	42	NA	N
43	Trichloroethylene	1	81	NA	N
44	Vinyl Chloride	1	525	NA	N
45	Chlorophenol	2	400	NA	N

# in CTR	PRIORITY POLLUTANTS	MEC or Minimum DL ¹ ($\mu\text{g/L}$)	Governing WQO/WQC ($\mu\text{g/L}$)	Maximum Background ($\mu\text{g/L}$)	RPA Results ²
46	2,4-Dichlorophenol	2	790	NA	N
47	2,4-Dimethylphenol	2	2300	NA	N
48	2-Methyl-4,6-Dinitrophenol	10	765	NA	N
49	2,4-Dinitrophenol	10	14000	NA	N
50	2-Nitrophenol	2	NA	NA	Uo
51	4-Nitrophenol	10	NA	NA	Uo
52	3-Methyl-4-Chlorophenol	5	NA	NA	Uo
53	Pentachlorophenol	10	7.9	NA	N
54	Phenol	2	4600000	NA	N
55	2,4,6-Trichlorophenol	2	6.5	NA	N
56	Acenaphthene	2	2700	NA	N
57	Acenaphthylene	2	NA	NA	Uo
58	Anthracene	2	110000	NA	N
59	Benzidine	5	0.00054	NA	N
60	Benzo(a)Anthracene	2	0.049	NA	N
61	Benzo(a)Pyrene	2	0.049	NA	N
62	Benzo(b)Fluoranthene	2	0.049	NA	N
63	Benzo(ghi)Perylene	2	NA	NA	Uo
64	Benzo(k)Fluoranthene	2	0.049	NA	N
65	Bis(2-Chloroethoxy)Methane	5	NA	NA	Uo
66	Bis(2-Chloroethyl)Ether	2	1.4	NA	N
67	Bis(2-Chloroisopropyl)Ether	2	170000	NA	N
68	Bis(2-Ethylhexyl)Phthalate	10	5.9	NA	N
69	4-Bromophenyl Phenyl Ether	5	NA	NA	Uo
70	Butylbenzyl Phthalate	5	5200	NA	N
71	2-Chloronaphthalene	2	4300	NA	N
72	4-Chlorophenyl Phenyl Ether	5	NA	NA	Uo
73	Chrysene	2	0.049	NA	N
74	Dibenzo(a,h)Anthracene	2	0.049	NA	N
75	1,2 Dichlorobenzene	1	17000	NA	N
76	1,3 Dichlorobenzene	1	2600	NA	N
77	1,4 Dichlorobenzene	1	2600	NA	N
78	3,3-Dichlorobenzidine	5	0.077	NA	N
79	Diethyl Phthalate	5	120000	NA	N
80	Dimethyl Phthalate	5	2900000	NA	N
81	Di-n-Butyl Phthalate	5	12000	NA	N
82	2,4-Dinitrotoluene	2	9.1	NA	N
83	2,6-Dinitrotoluene	5	NA	NA	Uo
84	Di-n-Octyl Phthalate	5	NA	NA	Uo
85	1,2-Diphenylhydrazine	5	0.54	NA	N
86	Fluoranthene	2	370	NA	N
87	Fluorene	2	14000	NA	N
88	Hexachlorobenzene	2	0.00077	NA	N
89	Hexachlorobutadiene	1	50	NA	N
90	Hexachlorocyclopentadiene	5	17000	NA	N
91	Hexachloroethane	2	8.9	NA	N
92	Indeno(1,2,3-cd) Pyrene	2	0.049	NA	N

# in CTR	PRIORITY POLLUTANTS	MEC or Minimum DL ¹ ($\mu\text{g/L}$)	Governing WQO/WQC ($\mu\text{g/L}$)	Maximum Background ($\mu\text{g/L}$)	RPA Results ²
93	Isophorone	2	600	NA	N
94	Naphthalene	2	NA	NA	Uo
95	Nitrobenzene	2	1900	NA	N
96	N-Nitrosodimethylamine	2	8.1	NA	N
97	N-Nitrosodi-n-Propylamine	2	1.4	NA	N
98	N-Nitrosodiphenylamine	2	16	NA	N
99	Phenanthrene	2	NA	NA	Uo
100	Pyrene	2	11000	NA	N
101	1,2,4-Trichlorobenzene	2	NA	NA	Uo
102	Aldrin	0.025	0.00014	NA	N
103	alpha-BHC	0.025	0.013	NA	N
104	beta-BHC	0.025	0.046	NA	N
105	Gamma-BHC	0.025	0.063	NA	N
106	delta-BHC	0.025	NA	NA	Uo
107	Chlordane	0.5	0.00059	NA	N
108	4,4'-DDT	0.15	0.00059	NA	N
109	4,4'-DDE	0.05	0.00059	NA	Y
110	4,4'-DDD	0.15	0.00084	NA	N
111	Dieldrin	0.05	0.00014	NA	Y
112	alpha-Endosulfan	0.05	0.0087	NA	N
113	beta-Endosulfan	0.05	0.0087	NA	N
114	Endosulfan Sulfate	0.15	240	NA	N
115	Endrin	0.05	0.0023	NA	N
116	Endrin Aldehyde	0.15	0.81	NA	N
117	Heptachlor	0.025	0.00021	NA	N
118	Heptachlor Epoxide	0.025	0.00011	NA	N
119-125	PCBs	5	0.00017	NA	N
126	Toxaphene	2	0.0002	NA	N
	Tributyltin	2	0.01	NA	N

- 1) Maximum Effluent Concentration (MEC) in bold is the actual detected MEC, otherwise the MEC shown is the minimum detection level.

NA = Not Available (there is not monitoring data for this constituent).

- 2) RP = Yes, if (1) either MEC or Background > WQO/WQC.

RP = No, if (1) both MEC and background < WQO/WQC or (2) no background and all effluent data non-detect, or no background and MEC<WQO/WQC

RP = Ud (undetermined due to lack of effluent monitoring data).

RP = Uo (undetermined if no objective promulgated).

- v) *Organic constituents with limited data:* Reasonable potential could not be determined for many of the organic priority or toxic pollutants due to (i) water quality objectives that are lower than current analytical techniques can measure, (ii) the absence of applicable WQOs or WQCs, or (iii) the absence of background data. As required by the August 6, 2001 letter from Board staff to all permittees, the Discharger is required to initiate or continue to monitor for those pollutants in this category using analytical methods that provide the best detection limits reasonably feasible. These pollutants' RP will be reevaluated in the future to determine whether there is a need to add numeric effluent limits to the permit or to continue monitoring.

vi) *Uncertainties of RPA.* Board staff used the below analysis to determine the appropriate monitoring frequency for constituents that have WQO/WQC that are aquatic life driven. For silver and zinc, the RPA results are based on a limited data set of four samples. For mercury, the RPA results are based on a single sample. This limited data set may not accurately reflect the full range of concentrations for these constituents. To determine if a larger data set might trigger reasonable potential for these constituents, Board staff determined the maximum projected concentration of each constituent in accordance with the methodology described in Technical Support Document for Water Quality-Based Toxics Control (Technical Support Document) published by the USEPA Publication No. 505/2-90-001 and compared it with the most stringent water quality objective. For a 99% confidence level with only one data point (mercury) or four data points (silver and zinc), the Technical Support Document (p. 53-54) indicates that the projected MEC is determined by multiplying the actual MEC by 13.2 or 4.7, respectively. The results of this analysis are shown in the table below:

Table C. Potential of Priority Pollutant Metals to Trigger Reasonable Potential

<u>Constituent</u>	<u>Projected MEC ($\mu\text{g/L}$)</u>	<u>WQO/WQC ($\mu\text{g/L}$)</u>	<u>Projected MEC > WQO/WQC = More data necessary?</u>
Mercury	0.026	0.025	Yes = annual monitoring
Silver	0.705	0.15	Yes = quarterly monitoring
Zinc	122.0	26	Yes = quarterly monitoring

- vii) *Pollutants with no reasonable potential:* WQBELs are not included in the Order for constituents that do not have reasonable potential to cause or contribute to exceedance of applicable WQOs or WQC. However, monitoring for some of those pollutants is still required, as specified in the Board's conditional approval of the Discharger's Sampling Plan. If concentrations of these constituents are found to have increased significantly, the Discharger will be required to investigate the source(s) of the increase(s). Remedial measures are required if the increases pose a threat to water quality in the receiving water.
- viii) *Permit reopeners:* The permit includes a reopeners provision to allow numeric effluent limits to be added for any constituent that in the future exhibits reasonable potential to cause or contribute to exceedance of a WQO or WQC. This determination, based on monitoring results, will be made by the Board.
2. Final Water Quality-Based Effluent Limits: The final WQBELs were developed for the toxic and priority pollutants that were determined to have reasonable potential to cause or contribute to exceedances of the WQOs or WQC. Final effluent limitations were calculated based on appropriate WQOs/WQC and the appropriate procedures specified in Section 1.4 of the SIP (See Attachment 4 of this Fact Sheet). For the purpose of the Proposed Order, final WQBELs refer to all non-interim effluent limitations. The WQO or WQC used for each pollutant with reasonable potential is indicated in Table C below as well as in Attachment 4.

Table C. Water Quality Objectives/Criteria for Pollutants with RP

Pollutant	Chronic WQO/WQC ($\mu\text{g/L}$)	Acute WQO/WQC ($\mu\text{g/L}$)	Basis of Lowest WQO/WQC Used in RP
Copper	3.62	4.80	Basin Plan
Lead	0.55	13.98	Basin Plan

3. Interim Limits: Interim effluent limitations were derived for those constituents for which the Discharger has shown infeasibility of complying with the respective limits and has demonstrated that compliance schedules are justified based on the Discharger's source control and pollution minimization efforts in the past and continued efforts in the present and future. As current sample results for copper and lead are not sufficient to perform a meaningful analysis, and the previous Order does not contain an effluent limitation for copper, this Order does not include an interim limit for copper. The Discharger will collect additional monitoring data under the requirements of the monitoring plan for this Order. When additional data become available, the Board will develop an interim limit, as appropriate.

5. Basis for Receiving Water Limitations

- a) Receiving water limitations C.1, C.2, and C.3 (conditions to be avoided): These limits are based on the previous Order and the narrative/numerical objectives contained in Chapter 3 of the Basin Plan, pages 3-2 to 3-5.
- b) Receiving water limitation C.4 (compliance with State Law): This requirement is in the previous permit, requires compliance with Federal and State law, and is self-explanatory.

6. Basis for Self-Monitoring Requirements

The SMP includes monitoring at the outfalls for conventional, non-conventional, and toxic pollutants, and acute toxicity. For the most part, the monitoring is the same as required by the previous Order. This Order requires monthly monitoring for copper and lead, to determine compliance with effluent limitations. As a result of the data review performed during the chlorine attenuation study, which showed that it could persist in the discharge, this Order requires monthly monitoring for residual chlorine. In lieu of near field discharge specific ambient monitoring, it is acceptable that the Discharger participate in collaborative receiving water monitoring with other dischargers under the provisions of the August 6, 2001 letter, and the RMP.

7. Basis for Provisions

- a) Provisions D.1. (Permit Compliance and Rescission of Previous Permit): Time of compliance is based on 40 CFR 122. The basis of this Order superceding and rescinding the previous permit Order is 40 CFR 122.46.
- b) Provision D.2 (Receiving Water Monitoring): This provision, which requires the Discharger to continue to conduct receiving water monitoring is based on the Basin Plan and the SIP.
- c) Provision D.3 (Whole Effluent Acute Toxicity): This provision establishes conditions by which compliance with permit effluent limits for acute toxicity will be demonstrated. Conditions initially include the use of 96-hour static renewal bioassays, the use of fathead minnow, rainbow trout, or three-spine stickleback as the test species, and the use of approved test methods as

specified. On February 1, 2004, the Discharger shall switch from the 3rd to 5th Edition U.S. EPA protocol, unless it demonstrates that such a switch is not feasible.

- d) Provision D.4 (Copper Compliance Schedule): This provision, based on BPJ and SIP requirements, requires the Discharger to take specific actions to achieve compliance with the final effluent limitations for copper by March 30, 2010.
- e) Provision D.5 (Lead Compliance Schedule): This provision, based on BPJ and SIP requirements, requires the Discharger to take specific actions to achieve compliance with the final effluent limitations for lead by March 30, 2010.
- f) Provision D.6 (Operations and Maintenance Manual): These provisions are based on Section D.1 of Standard Provisions, and requirements of 40 CFR 122.41(e). An Operations and Maintenance Manual is required to assure the proper operations and maintenance of any process important for achieving compliance with this NPDES Order, such as the dechlorination system (sodium metabisulfite tank and pumps).
- g) Provision D.7 (Self-Monitoring Program): The Discharger is required to conduct monitoring of the permitted discharges in order to evaluate compliance with permit conditions. Monitoring requirements are contained in the Self Monitoring Program (SMP) of the Permit. This provision requires compliance with the SMP, and is based on 40 CFR 122.44(i), 122.62, 122.63 and 124.5. The SMP is a standard requirement in almost all NPDES permits issued by the Board, including this Order. It contains definitions of terms, specifies general sampling and analytical protocols, and sets out requirements for reporting of spills, violations, and routine monitoring data in accordance with NPDES regulations, the California Water Code, and Board's policies. The SMP also contains a sampling program specific for the facility. It defines the sampling stations and frequency, the pollutants to be monitored, and additional reporting requirements. Pollutants to be monitored include all parameters for which effluent limitations are specified. Monitoring for additional constituents, for which no effluent limitations are established, is also required to provide data for future completion of RPAs for them.
- h) Provision D.8 (Standard Provisions and Reporting Requirements): The purpose of this provision is require compliance with the standard provisions and reporting requirements given in this Board's document titled *Standard Provisions and Reporting Requirements for NPDES Surface Water Discharge Permits, August 1993* (the Standard Provisions), or any amendments thereafter. That document is incorporated in the permit as an attachment to it. Where provisions or reporting requirements specified in the permit are different from equivalent or related provisions or reporting requirements given in the Standard Provisions, the permit specifications shall apply. The standard provisions and reporting requirements given in the above document are based on various state and federal regulations with specific references cited therein.
- i) Provision D.9 (Change in Control or Ownership): This provision is based on 40 CFR 122.61.
- j) Provision D.10 (Permit Reopener): This provision is based on 40 CFR 123
- k) Provision D.11 (NPDES Permit /U.S. EPA concurrence): This provision is based on 40 CFR 123.
- l) Provision D.12 (Permit Expiration and Reapplication): This provision is based on 40 CFR 122.46(a).

V. WASTE DISCHARGE REQUIREMENT APPEALS

Any person may petition the State Water Resources Control Board to review the decision of the Board regarding the Waste Discharge Requirements. A petition must be made within 30 days of the Board public hearing.

VI. ATTACHMENTS

Attachment 1: Effluent Data For Conventional Pollutants

Attachment 2: Effluent Data For Priority Pollutants

Attachment 3: RPA Results for Priority Pollutants

Attachment 4: Calculation of Final WQBELs

Attachment 5: General Basis for Final Compliance Dates

Attachment 1
Effluent Data For Conventional Pollutants
Bottling Group, LLC

Date	Flow gallons	pH pH units	Temperature deg. C	TSS mg/L	TDS mg/L	Residual Chlorine mg/L	Bioassays	
							Three-Spined Stickleback	Rainbow Trout % Survival
7-Jan-00	495,800	7.3	14.2					
14-Jan-00	494,900	6.9	15					
17-Jan-00	77,500	6.9	14.1	< 10	140	< 0.05		
20-Jan-00	365,700	7.5	15					
27-Jan-00	347,000	7.2	15					
4-Feb-00	318,800	7.2	15.6					
11-Feb-00	444,300	7.3	14.4					
14-Feb-00	69,900	7.4	15.2	< 10	168	< 0.05	100	90
18-Feb-00	483,700	7.2	15.6					
1-Mar-00	776,900	7.4	14.5					
10-Mar-00	699,500	7.1	15.6					
17-Mar-00	1,188,200	7.1	14.9					
20-Mar-00	71,000	7.1	16.2	< 10	274	< 0.05		
24-Mar-00	537,700	7.3	15.3					
31-Mar-00	754,800	7.5	16.3					
7-Apr-00	726,000	7.1	16.1					
15-Apr-00	708,000	7.5	17					
20-Apr-00	521,600	7.9	16	< 10	120	0.168		
28-Apr-00	1,234,300	7.5	15					
5-May-00	591,600	7	15.6					
12-May-00	524,000	6.4	15.9	< 10	116	< 0.05		
19-May-00	543,400	7.2	14.2					
26-May-00	709,900	7.4	15.7					
7-Jun-00	861,600	7.8	16.3					
12-Jun-00	507,300	8.3	20.4	< 10	186	< 0.05	100	100
14-Jun-00	760,400	7.3	17.3					
21-Jun-00	662,900	7.4	16.5					
28-Jun-00	708,400	7.8	17					
7-Jul-00	1,013,900	7.2	16.9					
10-Jul-00	166,000	7.5	18.4	< 10	5430	< 0.05		
14-Jul-00	673,900	7.4	16.3					
21-Jul-00	722,700	7.1	17					
28-Jul-00	633,100	7.1	17.4					
4-Aug-00	703,900	7.4	17.8					
7-Aug-00	169,200	7.3	17.6	< 10	326	0.056		
8-Aug-00	130,200	7.4	17.9				100	95
11-Aug-00	688,400	7.4	18.1					
18-Aug-00	800,900	7.2	17.7					
25-Aug-00	817,800	6.9	18.2					
8-Sep-00	1,547,100	7.4	18.7					
13-Sep-00	403,600	7.1	18.4	< 10	206	0.056		
15-Sep-00	695,200	7.4	18.7					
22-Sep-00	668,800	7.2	20					
29-Sep-00	613,700	7	18.9					
3-Oct-00	599,800	8.5	19.3	< 10	190	< 0.05		
5-Oct-00	259,500	7.2	19.4			< 0.05		
6-Oct-00	365,200	7.2	18.2					
13-Oct-00	553,600	7.1	18.1					
20-Oct-00	680,000	7.3	18.1					
27-Oct-00	664,100	6.9	17.9					
3-Nov-00	707,300	6.8	17.6					
6-Nov-00	230,200	6.9	17.7	< 10	134	< 0.05	95	100
9-Nov-00	388,000	6.9	16.9					
17-Nov-00	5,118,000	6.8	16.4					
22-Nov-00	436,300	6.8	16.2					
30-Nov-00	585,200	7.1	16.1					
8-Dec-00	748,200	6.9	16.1					
11-Dec-00	76,700	7.1	15.8	< 10	160	< 0.05		
16-Dec-00	556,700	7.3	15.4					
21-Dec-00	447,000	7.3	15.4					
29-Dec-00	724,800	6.7	15.1					
5-Jan-01	206,800	6.9	14.6					
12-Jan-01	753,800	7.1	14.4					
15-Jan-01	123,700	8.2	11.9	< 10	250	< 0.05		
19-Jan-01	576,900	7.7	14.3					
26-Jan-01	627,400	8.1	14.2					
2-Feb-01	702,200	7.5	14					
9-Feb-01	689,400	7.2	14					
16-Feb-01	600,600	7.3	13.4	< 10	88	< 0.05		
23-Feb-01	546,200	6.8	13.3					
2-Mar-01	648,200	7.1	13.1					
5-Mar-01	144,600	7.9	12.5	< 10	170	< 0.05	90	100
9-Mar-01	476,200	6.9	13.4					
16-Mar-01	679,000	6.9	13.4					
23-Mar-01	653,820	6.7	13.7					

Attachment 1
Effluent Data For Conventional Pollutants
Bottling Group, LLC

Date	Flow	pH	Temperature	TSS	TDS	Residual Chlorine	Bioassays	
							Three-Spined Stickleback	Rainbow Trout
							% Survival	
30-Mar-01	665,920	6.7	14.2					
6-Apr-01	753,533	7.1	14.1					
13-Apr-01	710,667	6.9	14.4					
18-Apr-01	412,600	7.2	13.2	< 10	284	< 0.05		
20-Apr-01	225,400	6.9	13.8					
27-Apr-01	684,700	6.9	15.3					
4-May-01	554,600	7.3	16					
11-May-01	722,100	7.4	15.1					
18-May-01	820,000	7.8	14.9					
21-May-01	293,400	7.1	15.1	< 1	230	< 0.05		
25-May-01	155,100	7.2	15.3				95	100
31-May-01	516,300	7.4	15.6					
8-Jun-01	879,100	7.3	15					
15-Jun-01	815,400	7.8	15.3					
22-Jun-01	725,200	7.1	15.2	< 10	170	< 0.05		
29-Jun-01	715,400	6.9	15.3					
6-Jul-01	676,600	7.2	16.4					
13-Jul-01	860,900	6.9	17.1					
20-Jul-01	797,600	7.4	17					
27-Jul-01	690,922	6.8	15.7					
30-Jul-01	165,075	7.4	15.5	< 10	160	< 0.05		
3-Aug-01	474,800	7.4	16.6					
10-Aug-01	161,548	6.5	16.2					
14-Aug-01	331,000	8.5	16.2	2	240	< 0.05		
17-Aug-01	710,700	7.3	15.3				100	100
24-Aug-01	43,580	7.4	16.6					
31-Aug-01	735,120	7.3	17.9					
7-Sep-01	1,242,780	6.8	17.7					
11-Sep-01	449,800	7.5	17.6	< 10	250	< 0.05		
13-Sep-01	658,200	7.1	18.9					
21-Sep-01	134,960	7.1	16.9					
28-Sep-01	247,850	6.7	16.3					
5-Oct-01	655,500	7.2	17.1					
9-Oct-01	265,600	7.2	16.8	< 10	140	< 0.05		
12-Oct-01	739,800	6.9	17.7					
19-Oct-01	798,300	7.1	17.4					
26-Oct-01	329,000	7.3	17					
2-Nov-01	658,000	7.4	17					
9-Nov-01	842,100	7.4	17.2					
16-Nov-01	622,500	7.3	17.1					
23-Nov-01	722,900	7.5	16.8					
30-Nov-01	706,100	7	16.7					
7-Dec-01	619,100	7.4	16.4					
13-Dec-01	562,800	6.9	16.1					
17-Dec-01	136,700	7.4	14.1	1	310	< 0.05	100	100
21-Dec-01	548,500	7.1	15.8					
28-Dec-01	517,600	7.4	16.6	2	330	< 0.05		
4-Jan-02	1,106,020	7.17	14.8					
10-Jan-02	1,557,440	7.56	15.0					
18-Jan-02	1,863,790	7.14	14.0					
21-Jan-02	346,100			< 1	190	< 0.05		
24-Jan-02	1,299,170	7.1	12.2					
31-Jan-02	1,678,000	6.86	13.3					
4-Feb-02	807,410	7.7	12.2	< 10	220	< 0.05		
8-Feb-02	1,788,250	7.28	13.6					
14-Feb-02	1,922,790	7.38	14.9					
23-Feb-02	2,082,920	7.4	13.9					
7-Mar-02	5,687,740	7.3	12.5	< 1	160	< 0.05	75	100
8-Mar-02	291,320	7.03	13.3					
15-Mar-02	2,432,600	7.06	13.2					
22-Mar-02	2,524,030	6.67	12.7					
29-Mar-02	2,648,520	6.68	12.9					
1-Apr-02	156,200	7.5	13	< 1	130	< 0.05	90	100
5-Apr-02	540,600	7	13.3					
12-Apr-02	806,600	7.2	12.9					
19-Apr-02	916,600	7.1	13.1					
26-Apr-02	478,000	7.1	13.2					
3-May-02	982,000	7.2	13.8					
6-May-02	351,300	7.7	13.5	< 10	180	< 0.05		
10-May-02	654,000	7.2	13.4					
17-May-02	887,800	7.4	13.9					
24-May-02	889,800	7.3	14.2					
31-May-02	623,100	7.2	13.9					
3-Jun-02	384,800	7.2	14.5	< 10	200	< 0.05		
7-Jun-02	368,600	7.4	14.1					
14-Jun-02	739,400	6.7	14.3					

Attachment 1
 Effluent Data For Conventional Pollutants
 Bottling Group, LLC

Date	Flow gallons	pH pH units	Temperature deg. C	TSS mg/L	TDS mg/L	Residual Chlorine mg/L	Bioassays	
							Three-Spined Stickleback	Rainbow Trout % Survival
21-Jun-02	799,000	7.3	14.6					
28-Jun-02	866,000	7.6	14.8					
5-Jul-02	833,000	7	15.8					
8-Jul-02	385,600	6.9	16.2	< 1	240	< 0.05		
11-Jul-02	366,700	7	15.8					
17-Jul-02	532,700	7.1	18.3					
24-Jul-02	679,200	7	17.8					
2-Aug-02	956,700	6.8	15.8					
5-Aug-02	139,100	7.1	20	< 10	150	< 0.05		
9-Aug-02	447,800	6.4	16					
16-Aug-02	736,900	6.9	15.6					
23-Aug-02	889,700	6.7	15.2					
30-Aug-02	905,100	6.6	15.8					
3-Sep-02	293,100	6.6	15.5	< 10	130	< 0.05		
6-Sep-02	407,000	6.9	15.6					
13-Sep-02	674,800	6.6	15.8					
20-Sep-02	723,900	7.3	16.3					
27-Sep-02	649,200	6.5	16					
Maximum		8.5	20.4	10	5430	0.168	100	100
Minimum		6.4	11.9	< 1	88	< 0.05	75	90
Average			15.68		353.70			

Attachment 2
 Effluent Data for Priority Pollutants
 (Adapted from Permit Renewal Application Data Set)
 Bottling Group, LLC

		6/17/96	6/18/96	6/19/96	6/21/96	7/12/96	6/4/01	6/4/01	3/7/02	4/1/02	7/8/02	10/7/02	MEC
1	Antimony	2.9	0.34	0.24	0.15								2.9
2	Arsenic ^b	0.78	1.4	1.6	0.49								1.6
3	Beryllium	< 0.05	< 0.05	< 0.05	< 0.05								< 0.05
4	Cadmium	0.04	0.04	0.05	< 0.02								0.05
5a	Chromium (III)	1.6	1.3	1.3	0.98		6.4						6.4
5b	Chromium (VI)					< 10							< 10
6	Copper	8.4	8.8	12	4.8				1.6	< 5.0	1.8	2.2	12
7	Lead	0.84	0.82	1.3	< 0.3								1.3
8	Mercury	0.02	< 0.02	0.04	< 0.02		0.002						0.002
9	Nickel	2.7	3.7	2	1.7								3.7
10	Selenium	< 0.6	< 0.6	< 0.6	< 0.6								< 0.6
11	Silver	0.15	0.15	< 0.1	< 0.1								0.15
12	Thallium	0.01	0.01	0.01	< 0.01								0.01
13	Zinc	23	18	26	21								26
14	Cyanide					< 10							< 10
15	Asbestos												
16	2,3,7,8 TCDD					< 0.00043							< 0.00043
17	Acrolein						< 10						< 10
18	Acrylonitrile						< 2						< 2
19	Benzene				< 2		< 1						< 1
20	Bromoform				< 2		< 1						< 1
21	Carbon Tetrachloride				< 2		< 1						< 1
22	Chlorobenzene				< 2								< 2
23	Chlorodibromomethane				< 2		< 1						1
24	Chloroethane					< 1							1
25	2-Chloroethylvinyl ether				< 10		< 2						2
26	Chloroform				110		76						110
27	Dichlorobromomethane				7.2		2.3						7.2
28	1,1-Dichloroethane			< 2		< 1							< 1
29	1,2-Dichloroethane			< 2		< 1							< 1
30	1,1-Dichloroethylene			< 2		< 1							< 1
31	1,2-Dichloropropane			< 2		< 1							< 1
32	1,3-Dichloropropylene												
33	Ethylbenzene			< 2		< 1							< 1
34	Methyl Bromide			8.4		< 1							8.4
35	Methyl Chloride			< 2		< 1							< 1
36	Methylene Chloride			< 5									< 5
37	1,1,2,2-Tetrachloroethane			< 2		< 1							< 1
38	Tetrachloroethylene			< 2		< 1							< 1
39	Toluene			< 2		< 1							< 1
40	1,2-Trans-Dichloroethylene			< 2		< 1							< 1
41	1,1,1-Trichloroethane			< 2		< 1							< 1
42	1,1,2-Trichloroethane			< 2		< 1							< 1
43	Trichloroethylene			< 2		< 1							< 1
44	Vinyl Chloride			< 2		< 1							< 1
45	2-Chlorophenol			< 2									< 2
46	2,4-Dichlorophenol				< 2								< 2
47	2,4-Dimethylphenol				< 2								< 2
48	2-Methyl- 4,6-Dinitrophenol				10								< 10
49	2,4-Dinitrophenol				10								< 10
50	2-Nitrophenol			< 5	< 2								< 2
51	4-Nitrophenol			< 10	< 10								< 10
52	3-Methyl 4-Chlorophenol			< 5	< 5								< 5
53	Pentachlorophenol			< 10	< 10								< 10
54	Phenol			< 5	< 2								< 2
55	2,4,6-Trichlorophenol			< 5	< 2								< 2
56	Acenaphthene			< 5	< 2								< 2
57	Acenaphthylene			< 5	< 2								< 2
58	Anthracene			< 5	< 2								< 2
59	Benzidine												
60	Benzo(a)Anthracene			< 5	< 2								< 2
61	Benzo(a)Pyrene			< 5	< 2								< 2
62	Benzo(b)Fluoranthene			< 5	< 2								< 2
63	Benzo(ghi)Perylene			< 5	< 2								< 2
64	Benzo(k)Fluoranthene			< 5	< 2								< 2
65	Bis(2-Chloroethoxy)Methane			< 5	< 5								< 5
66	Bis(2-Chloroethyl)Ether			< 5	< 2								< 2
67	Bis(2-Chloroisopropyl)Ether			< 5	< 2								< 2
68	Bis(2-Ethylhexyl)Phthalate			< 10	< 10								< 10
69	4-Bromophenyl Phenyl Ether			< 5	< 5								< 5
70	Butylbenzyl Phthalate			< 5	< 5								< 5
71	2-Chloronaphthalene			< 5	< 2								< 2
72	4-Chlorophenyl Phenyl Ether			< 5	< 5								< 5
73	Chrysene			< 5	< 2								< 2
74	Dibenzo(a,h)Anthracene			< 5	< 2								< 2
75	1,2-Dichlorobenzene			< 5	< 2	< 1							< 1
76	1,3-Dichlorobenzene			< 5	< 2	< 1							< 1
77	1,4-Dichlorobenzene			< 5	< 2	< 1							< 1
78	3,3 Dichlorobenzidine			< 10	< 5								< 5

Attachment 2
 Effluent Data for Priority Pollutants
 (Adapted from Permit Renewal Application Data Set)
 Bottling Group, LLC

		6/17/96	6/18/96	6/19/96	6/21/96	7/12/96	6/4/01	6/4/01	3/7/02	4/1/02	7/8/02	10/7/02	MEC
79	Diethyl Phthalate				< 5	< 5							< 5
80	Dimethyl Phthalate				< 5	< 5							< 5
81	Di-n-Butyl Phthalate				< 10	< 5							< 5
82	2,4-Dinitrotoluene				< 5	< 2							< 2
83	2,6-Dinitrotoluene				< 5	< 5							< 5
84	Di-n-Octyl Phthalate				< 5	< 5							< 5
85	1,2-Diphenylhydrazine												
86	Fluoranthene				< 5	< 2							< 2
87	Fluorene				< 5	< 2							< 2
88	Hexachlorobenzene				< 5	< 2							< 2
89	Hexachlorobutadiene				< 5	< 2	< 1						< 1
90	Hexachlorocyclopentadiene				< 10	< 5							< 5
91	Hexachloroethane				< 5	< 2							< 2
92	Indeno(1,2,3-cd)Pyrene				< 5	< 2							< 2
93	Isophorone				< 5	< 2							< 2
94	Naphthalene				< 5	< 2							< 2
95	Nitrobenzene				< 5	< 2							< 2
96	N-Nitrosodimethylamine												
97	N-Nitrosodi-n-Propylamine				< 5	< 2							< 2
98	N-Nitrosodiphenylamine				< 5	< 2							< 2
99	Phenanthrene				< 5	< 2							< 2
100	Pyrene				< 5	< 2							< 2
101	1,2,4-Trichlorobenzene				< 5	< 2							< 2
102	Aldrin				< 0.025								< 0.025
103	alpha-BHC				< 0.025								< 0.025
104	beta-BHC				< 0.025								< 0.025
105	gamma-BHC				< 0.025								< 0.025
106	delta-BHC				< 0.025								< 0.025
107	Chlordane				< 0.5								< 0.5
108	4,4'-DDT				< 0.15								< 0.15
109	4,4'-DDE (linked to DDT)				< 0.05								< 0.05
110	4,4'-DDD				< 0.15								< 0.15
111	Dieldrin				< 0.05								< 0.05
112	alpha-Endosulfan				< 0.05								< 0.05
113	beta-Endosulfan				< 0.05								< 0.05
114	Endosulfan Sulfate				< 0.15								< 0.15
115	Endrin				< 0.05								< 0.05
116	Endrin Aldehyde				< 0.15								< 0.15
117	Heptachlor				< 0.025								< 0.025
118	Heptachlor Epoxide				< 0.025								< 0.025
119-125	PCBs sum (2)				< 5								< 5
126	Toxaphene				< 2								< 2
	Tributyltin				< 2								< 2
	Note:												
	Mercury - Effluent data from 1996 showed two detected values, 0.02 ug/L and 0.04 ug/L. This data, however, was collected prior to the use of recommended ultraclean sampling and low level analytical methods. The data point from 2001, 0.002, represents the only available data point collected using the recommended sampling methods. Additional data for mercury using ultraclean methods are being collected as required by the August 6, 2001 letter. The Regional Board will continue to evaluate reasonable potential as these data become available, as necessary.												

Attachment 3
Reasonable Potential Analysis
Bottling Group, LLC
January 20, 2003

Green highlight checks for input inconsistenc
Yellow highlights are user input

Beginning	Constituent name	C ($\mu\text{g/L}$) Lowest (most stringent) Criteria (Enter "No Criteria" for no criteria)	Step 2				Step 3		Concentration from the effluent (MEC) (MEC= detected max value; if all ND & MDL<C then MEC = MDL)	Step 4		Step 5		Step 6		Steps 7 & 8		Final Result	
			Effluent Data Available (Y/N)?	Are all data points non- detects (Y/N)?	If all data points ND Enter the min detection limit (MDL) ($\mu\text{g/L}$)	Enter the pollutant effluent detected max conc ($\mu\text{g/L}$)	If all data points are ND and MinDL>C, interim monitoring is required	MEC vs. C	B ($\mu\text{g/L}$)	B vs. C	Enter the Maximum Background Conc If B>C, effluent limitation is required	7) Review other information in the SIP page 4. If information is unavailable or insufficient: 8) the RWQCB shall establish interim monitoring requirements.	RPA Result	Reason					
1	Antimony	4,300	Y	N		2.9			2.9	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
2	Arsenic ^a	190	Y	N		1.6			1.6	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
3	Beryllium	No Criteria	Y	Y	0.05		No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
4	Cadmium ^a	0.382	Y	N		0.05			0.05	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
5a	Chromium (III)	66.50	Y	N		6.4			6.4	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
5b	Chromium (VI) ^a	11.00	Y	Y	10		All ND, MDL<C, MEC=MDL		10	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
6	Copper (303d listed) ^b	3,617	Y	N		12			12	MEC>C, Effluent Limits Required	No ambient data	No ambient data, to Step 7		Yes	MEC<C				
7	Lead ^a	0.545	Y	N		1.3			1.3	MEC<C, Effluent Limits Required	No ambient data	No ambient data, to Step 7		Yes	MEC<C				
8	Mercury (303d listed) ^{a,b}	0.025	Y	N		0.002			0.002	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
9	Nickel ^a	48.80	Y	N		3.7			3.7	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
10	Selenium (303d listed) ^a	5.00	Y	Y	0.6		All ND, MDL<C, MEC=MDL		0.6	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
11	Silver ^a	0.37399	Y	N		0.15			0.15	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
12	Thallium	6.30	Y	N		0.01			0.01	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
13	Zinc ^a	32.75	Y	N		26			26	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
14	Cyanide ^a	5.20	Y	Y	10		All ND, MinDL>C, Go to Step 5, & II				No ambient data	No ambient data, to Step 7		No	MDL<C & no B				
15	Asbestos	No Criteria	N				No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
16	2,3,7,8 TCDD (303d listed)	0.000000014	Y	Y	0.00043		All ND, MinDL>C, Go to Step 5, & II				No ambient data	No ambient data, to Step 7		No	MDL<C & no B				
17	Acrolein	780	Y	Y	10		All ND, MDL<C, MEC=MDL		10	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
18	Acrylonitrile	0.66	Y	Y	2		All ND, MinDL>C, Go to Step 5, & II				No ambient data	No ambient data, to Step 7		No	MDL<C & no B				
19	Benzene	71	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
20	Bromoform	360	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
21	Carbon Tetrachloride	4.4	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
22	Chlorobenzene	21,000	Y	Y	2		All ND, MDL<C, MEC=MDL		2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
23	Chlorodibromomethane	34	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
24	Chloroethane	No Criteria	Y	Y	1		No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
25	2-Chloroethylvinyl ethe	No Criteria	Y	Y	2		No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
26	Chloroform	No Criteria	Y	N		110	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
27	Dichlorobromomethane	46	Y	N		7.2			7.2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
28	1,1-Dichloroethane	No Criteria	Y	Y	1		No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
29	1,2-Dichloroethane	99	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
30	1,1-Dichloroethylene	3.2	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
31	1,2-Dichloropropane	39	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
32	1,3-Dichloropropylene	1,700	Y	Y	2		All ND, MDL<C, MEC=MDL		2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
33	Ethylbenzene	29,000	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
34	Methyl Bromide	4,000	Y	N		8.4			8.4	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
35	Methyl Chloride	No Criteria	Y	Y	1		No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
36	Methylene Chloride	1,600	Y	Y	5		All ND, MDL<C, MEC=MDL		5	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
37	1,1,2,2-Tetrachloroethane	11	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
38	Tetrachloroethylene	8.85	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
39	Toluene	200,000	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
40	1,2-Trans-Dichloroethylene	140,000	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
41	1,1,1-Trichloroethane	No Criteria	Y	Y	1		No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
42	1,1,2-Trichloroethane	42	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
43	Trichloroethylene	81	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
44	Vinyl Chloride	525	Y	Y	1		All ND, MDL<C, MEC=MDL		1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
45	2-Chloropheno	400	Y	Y	2		All ND, MDL<C, MEC=MDL		2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
46	2,4-Dichloropheno	790	Y	Y	2		All ND, MDL<C, MEC=MDL		2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
47	2,4-Dimethylpheno	2,300	Y	Y	2		All ND, MDL<C, MEC=MDL		2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
48	2-Methyl- 4,6-Dinitrophen	765	Y	Y	10		All ND, MDL<C, MEC=MDL		10	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
49	2,4-Dinitropheno	14,000	Y	Y	10		All ND, MDL<C, MEC=MDL		10	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
50	2-Nitrophenol	No Criteria	Y	Y	2		No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
51	4-Nitrophenol	No Criteria	Y	Y	10		No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
52	3-Methyl 4-Chloropheno	No Criteria	Y	Y	5		No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				
53	Pentachloropheno	8.20	Y	Y	10		All ND, MinDL>C, Go to Step 5, & II		1		No ambient data	No ambient data, to Step 7		No	MDL<C & no B				
54	Phenol	4,600,000	Y	Y	2		All ND, MDL<C, MEC=MDL		2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
55	2,4,6-Trichloropheno	6.50	Y	Y	2		All ND, MDL<C, MEC=MDL		2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
56	Acenaphthene	2,700	Y	Y	2		All ND, MDL<C, MEC=MDL		2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7		No	UD; MEC<C & no B				
57	Acenaphthylene	No Criteria	Y	Y	2		No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No Criteria	No	No Criteria				

Attachment 3
Reasonable Potential Analysis
Bottling Group, LLC
January 20, 2003

Beginning	Constituent name	C ($\mu\text{g/L}$)	Step 2		Step 3		If all data points ND Enter the min detection limit (MDL) ($\mu\text{g/L}$)	Enter the pollutant effluent detected max conc ($\mu\text{g/L}$)	Concentration from the effluent (MEC)	Step 4		Step 5		Step 6		Steps 7 & 8		Final Result	
			Effluent Data Available (Y/N)?	Are all data points non-detects (Y/N)?	If all data points ND Enter the min detection limit (MDL) ($\mu\text{g/L}$)	If all data points are ND and MinDL>C, interim monitoring is required				(MEC= deleted max value; if all ND & MDL<C then MEC = MDL)	1. If MEC> or =C, effluent limitation is required; 2. If MEC<C, go to Step 5	B ($\mu\text{g/L}$)	B vs. C	Enter the Maximum Background Conc	If B>C, effluent limitation is required	7) Review other information in the SIP page 4. If information is unavailable or insufficient: 8) the RWQCB shall establish interim monitoring requirements.	RPA Result	Reason	
58	Anthracene	110,000	Y	Y	2	All ND, MDL<C, MEC=MDL	2	All ND, MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
59	Benzidine	0.00054	Y	Y	5	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
60	Benz(a)Anthracene	0.049	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
61	Benz(a)Pyrene	0.049	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
62	Benz(b)Fluoranthene	0.049	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
63	Benz(ghi)Perylene	No Criteria	Y	Y	2	No Criteria	No Criteria	No Criteria	No ambient data	No Criteria	No Criteria	No Criteria	Uo	No Criteria					
64	Benz(k)Fluoranthene	0.049	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
65	Bis(2-Chloroethoxy)Meth	No Criteria	Y	Y	5	No Criteria	No Criteria	No Criteria	No ambient data	No Criteria	No Criteria	No Criteria	Uo	No Criteria					
66	Bis(2-Chloroethyl)Ethe	1.40	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
67	Bis(2-Chloroisopropyl)Eth	170,000	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
68	Bis(2-Ethylhexyl)Phthalat	5.90	Y	Y	10	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
69	4-Bromophenyl Phenyl E	No Criteria	Y	Y	5	No Criteria	No Criteria	No Criteria	No ambient data	No Criteria	No Criteria	No Criteria	Uo	No Criteria					
70	Butylbenzyl Phthalat	5,200	Y	Y	5	All ND, MDL<C, MEC=MDL	5	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
71	2-Chloronaphthalen	4,300	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
72	4-Chlorophenyl Phenyl E	No Criteria	Y	Y	5	No Criteria	No Criteria	No Criteria	No ambient data	No Criteria	No Criteria	No Criteria	Uo	No Criteria					
73	Chrysene	0.049	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
74	Dibenz(a,h)Anthracene	0.049	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
75	1,2-Dichlorobenzene	17,000	Y	Y	1	All ND, MDL<C, MEC=MDL	1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
76	1,3-Dichlorobenzene	2,600	Y	Y	1	All ND, MDL<C, MEC=MDL	1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
77	1,4-Dichlorobenzene	2,600	Y	Y	1	All ND, MDL<C, MEC=MDL	1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
78	3,3 Dichlorobenzoic	0.077	Y	Y	5	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
79	Diethyl Phthalate	120,000	Y	Y	5	All ND, MDL<C, MEC=MDL	5	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
80	Dimethyl Phthalate	2,900,000	Y	Y	5	All ND, MDL<C, MEC=MDL	5	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
81	Di-n-Butyl Phthalate	12,000	Y	Y	5	All ND, MDL<C, MEC=MDL	5	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
82	2,4-Dinitrotoluene	9.10	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
83	2,6-Dinitroluene	No Criteria	Y	Y	5	No Criteria	No Criteria	No Criteria	No ambient data	No Criteria	No Criteria	No Criteria	Uo	No Criteria					
84	Di-n-Octyl Phthalate	No Criteria	Y	Y	5	No Criteria	No Criteria	No Criteria	No ambient data	No Criteria	No Criteria	No Criteria	Uo	No Criteria					
85	1,2-Diphenylhydrazine	0.54	Y	Y	5	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
86	Fluoranthene	370	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
87	Fluorene	14,000	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
88	Hexachlorobenzene	0.00077	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
89	Hexachlorobutadiene	50	Y	Y	1	All ND, MDL<C, MEC=MDL	1	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
90	Hexachlorocyclopentadi	17,000	Y	Y	5	All ND, MDL<C, MEC=MDL	5	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
91	Hexachloroethane	8.90	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
92	Indeno(1,2,3-cd)Pyrene	0.049	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
93	Isophorone	600	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
94	Naphthalene	No Criteria	Y	Y	2	No Criteria	No Criteria	No Criteria	No ambient data	No Criteria	No Criteria	No Criteria	Uo	No Criteria					
95	Nitrobenzene	1,900	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
96	N-Nitrosodimethylamine	8.10	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
97	N-Nitrosodi-n-Propylamin	1.40	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
98	N-Nitrosodiphenylamine	16	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
99	Phenanthrene	No Criteria	Y	Y	2	No Criteria	No Criteria	No Criteria	No ambient data	No Criteria	No Criteria	No Criteria	Uo	No Criteria					
100	Pyrene	11,000	Y	Y	2	All ND, MDL<C, MEC=MDL	2	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
101	1,2,4-Trichlorobenzene	No Criteria	Y	Y	2	No Criteria	No Criteria	No Criteria	No ambient data	No Criteria	No Criteria	No Criteria	Uo	No Criteria					
102	Aldrin	0.00014	Y	Y	0.025	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
103	alpha-BHC	0.013	Y	Y	0.025	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
104	beta-BHC	0.046	Y	Y	0.025	All ND, MDL<C, MEC=MDL	0.025	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
105	gamma-BHC	0.063	Y	Y	0.025	All ND, MDL<C, MEC=MDL	0.025	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
106	delta-BHC	No Criteria	Y	Y	0.025	No Criteria	No Criteria	No Criteria	No ambient data	No Criteria	No Criteria	No Criteria	Uo	No Criteria					
107	Chlordane (303d listed)	0.00059	Y	Y	0.5	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
108	4,4-DDT (303d listed)	0.00059	Y	Y	0.15	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
109	4,4'-DDE (linked to DDT)	0.00059	Y	Y	0.05	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
110	4,4'-DDD	0.00084	Y	Y	0.15	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
111	Dieldrin (303d listed)	0.00014	Y	Y	0.05	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
112	alpha-Endosulfar	0.0087	Y	Y	0.05	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
113	beta-Endosulfar	0.0087	Y	Y	0.05	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
114	Endosulfan Sulfat	240	Y	Y	0.15	All ND, MDL<C, MEC=MDL	0.15	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
115	Endrin	0.0023	Y	Y	0.05	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
116	Endrin Aldehyde	0.81	Y	Y	0.15	All ND, MDL<C, MEC=MDL	0.15	MEC<C, go to Step 5	No ambient data	No ambient data, to Step 7	No	UD; MEC<C & no B							
117	Heptachlor	0.00021	Y	Y	0.025	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
118	Heptachlor Epoxide	0.00011	Y	Y	0.025	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
119-125 PCBs sum (2)	0.00017	Y	Y	5	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B								
126	Toxaphene	0.00020	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B							
Tributyltin	0.01000	Y	Y	2	All ND, MinDL>C, Go to Step 5, & II			No ambient data	No ambient data, to Step 7	No	MDL>C & no B								

a. According to Table 1 of Section (b)(1) of CTR (40CFR 131.38), those criteria should use Basin Plan objectives; criteria for Se and CN are specified by the NTR.

Attachment 3
Reasonable Potential Analysis
Bottling Group, LLC
January 20, 2003

Beginning		Step 2	Step 3	If all data points ND Enter the min detection limit (MDL) (ug/L)	Enter the pollutant effluent detected max conc (ug/L)	Concentration from the effluent (MEC)	Step 4	Step 5	Step 6	Steps 7 & 8	Final Result
	C (ug/L) Lowest (most stringent) Criteria (Enter "No Criteria" for no criteria)	Effluent Data Available (Y/N)?	Are all data points non-detects (Y/N)?			If all data points are ND and MinDL>C, interim monitoring is required	(MEC= deleted max value; if all ND & MDL<C then MEC = MDL)	MEC vs. C	B (ug/L)	B vs. C	7) Review other information in the SIP page 4. If information is unavailable or insufficient: 8) the RWQCB shall establish interim monitoring requirements.

Under the Basin Plan and CTR definitions, receiving water is freshwater.

Therefore, freshwater criteria apply.

b. Criteria for copper is taken from CTR. CTR criteria for copper is expressed as dissolved metals. The copper criteria in the table is adjusted by dividing a factor of 0.83 to convert the dissolved to total metal concentration.

The criteria for Selenium is taken from NTR.

c. Acronyms in the "Final Result" column:

Ud: Cannot determine reasonable potential due to the absence of data, or because Minimum DL is greater than water quality objective or CTR criteria

Uo: Cannot determine reasonable potential due to the absence of water quality criteria or objectives

IM: Interim monitoring is required

DL: Detection limit above water quality objective or CTR criteria

Y(B): Reasonable potential due to ambient data exceedances

d. Refer to the table entitled "Metal Criteria after Adjusting Hardness" for detailed determination of the criteria C in shaded area.

e. Mercury - Effluent data from 1996 showed two detected values, 0.02 ug/L and 0.04 ug/L. This data, however, was collected prior to the use of recommended ultraclean sampling and low level analytical methods. The data point from 2001, 0.002, represents the only available data point collected using the recommended sampling methods. Additional data for mercury using ultraclean methods are being collected as required by the August 6, 2001 letter. The Regional Board will continue to evaluate reasonable potential as these data become available, as necessary.

2

Attachment 4
 Effluent Limitation Calculations (Per Section 1.4 of the SIP)
 Bottling Group, LLC

Note: Numbers in blue have formula in the cells - calculates values automatically

PRIORITY POLLUTANTS	Copper	Lead
Basis and Criteria type	BP FW (4-d, 1-hr avg)	BP FW (4-d, 1-hr avg)
Lowest WQO	3.62	0.545
Translators		
Dilution Factor (D) (if applicable)	0	0
no. of samples per month	4	4
Aquatic life criteria required? (Y/N)	Y	Y
HH criteria analysis required? (Y/N)	N	N
Applicable Acute WQO	4.8	13.98
Applicable Chronic WQO	3.62	0.545
HH criteria		
Background (max conc)		
Background (avg conc for HH calc)		
Is the pollutant Bioaccumulative(Y/N)? (e.g., Hg)	N	N
ECA acute	4.8	14.0
ECA chronic	3.62	0.545
ECA HH		
No. of data points <10 or atleast 80% of data reported non detect? (Y/N)	Y	Y
avg of data points		
SD		
CV calculated	N/A	N/A
CV (Selected) - Final	0.60	0.60
ECA acute mult99	0.32	0.32
ECA chronic mult99	0.53	0.53
LTA acute	1.54	4.49
LTA chronic	1.91	0.29
minimum of LTAs	1.54	0.29
AMEL mult95	1.55	1.55
MDEL mult99	3.11	3.11
AMEL (aq life)	2.39	0.45
MDEL(aq life)	4.80	0.90
MDEL/AMEL Multiplier	2.01	2.01
AMEL (human hlhs)		
MDEL (human hlhs)		
minimum of AMEL for Aq. life vs HH	2.39	0.45
minimum of MDEL for Aq. Life vs HH	4.80	0.90
Current limit in permit (30-d avg)	N/A	N/A
Current limits in permit (daily)	N/A	N/A
Final limit - AMEL	2.39	0.45
Final limit - MDEL	4.80	0.90
Max Efl Conc (MEC)	12	1.3
Interim Limits for those where TMDL is final limit		

Attachment 5

General Basis for Final Compliance Dates *Revised September 28, 2001*

Constituent	Reference for applicable standard	Maximum compliance schedule allowed	Compliance date and Basis
Cyanide (CCC of 1 ppb)	CTR	5 years	May 18, 2003 because background date not adequate. Time needed to collect more background and possibly for SSO (plus 5-yr in finding not to go beyond May 18, 2010). Basis is SIP 2.2.2.
Copper (salt), Chromium (III), Selenium	CTR (NTR for Se)	5 years	5-yr from effective date of permit (but not to go beyond May 18, 2010). Basis are CTR and SIP.
Copper (fresh), mercury, nickel, zinc, arsenic, cadmium, chromium (VI), lead, silver (CMC)	Numeric Basin Plan using SIP methodology	10 years	March 31, 2010 , which is 10 years (using full months) from effective date of SIP (April 28, 2000). Basis is the Basin Plan, see note [1].
Dioxins/Furans, Tributyltin, other toxic pollutants not in CTR	Narrative Basin Plan using SIP methodology	10 years	10-yr from effective date of permit (which is when new standard is adopted; no sunset date). Basis is the Basin Plan, see note [1].
Other priority pollutants on CTR and not listed above	CTR	5 years	5-yr from effective date of permit (but not to go beyond May 18, 2010). Basis is the CTR and SIP.

[1] The Basin Plan provides for a 10-year compliance schedule for implementation of measures to comply with new standards as of the effective date of those standards. This provision has been construed to authorize compliance schedules for new interpretations of existing standards, such as the numeric and narrative water quality objectives specified in the Basin Plan, if the new interpretations result in more stringent limits than in the previous permit.

- a. For numeric objectives, due to the adoption of the SIP, the Regional Board has newly interpreted these objectives. The effective date of this new interpretation is the effective date of the SIP (April 28, 2000) for implementation of these numeric Basin Plan objectives.
- b. For narrative objectives, the Board must newly interpreted these objectives using best professional judgement for each permit. Therefore, the effective date of this new interpretation will be the effective date of the permit.